

**MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES**

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

<b>Plaintiffs' Executive Committee for Personal Injury and Death Claims</b>	<b>Plaintiffs' Executive Committee for Commercial Claims</b>
Ronald L. Motley, (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haefele, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

February 26, 2021

The Honorable George B. Daniels  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, NY 10007

RE: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Daniels:

Pursuant to this Court's Individual Practices in Civil Cases IV.D., the Plaintiffs' Executive Committees file this letter request for oral argument of Plaintiffs' Fed.R.Civ.P. 72 objections to the Magistrate Judge's Orders dated February 1, 2021 (ECF No. 6510) and October 21, 2020 (ECF No. 6606), docketed today at ECF No. 6629. The Plaintiffs have objected to the Magistrate Judge's denial of their motions to compel the Federal Bureau of Investigation to produce documents in its possession about key agents and employees of the Kingdom of Saudi Arabia who provided material support for and aided and abetted the 9/11 Terrorist Attacks. The Magistrate Judge adopted the FBI's assertion of state secrets and law enforcement privileges as a basis for denying Plaintiffs access to that information.

Plaintiffs believe that oral argument on the issues that are the subject matter of the objections would assist the Court, as well as the government and the Plaintiffs, because the objections and motions raise important and unique issues of law and fact and the record is substantial and complex. Plaintiffs also request oral argument because the issues and facts involved go directly to the right of the public and litigants to obtain information from their government and concern matters of substantial civic concern, especially to the 9/11 community. A decision on these objections without oral argument would do a disservice to the 9/11 families and the public.

The Honorable George B. Daniels

February 26, 2021

Page 2

Respectfully submitted,

COZEN O'CONNOR

/s/ Sean P. Carter, Esquire

Sean P. Carter, Esquire  
1650 Market Street, Suite 2800  
Philadelphia, PA 19103

MDL 1570 Plaintiffs' Exec. Committee  
for Commercial Claims

MOTLEY RICE

/s/ Robert T. Haefele, Esquire

Robert T. Haefele, Esquire  
28 Bridgeside Boulevard  
Mt. Pleasant, SC 29464

MDL 1570 Plaintiffs' Exec. Committee  
for Personal Injury and Death Claims

KREINDLER & KREINDLER

/s/ Megan W. Benett

Steven R. Pounian, Esquire  
Megan W. Benett, Esquire  
750 Third Avenue, 32<sup>nd</sup> Floor  
New York, NY 10017

MDL 1570 Plaintiffs' Exec. Committee  
for Personal Injury and Death Claims

cc: All Counsel via ECF  
Sarah Normand, Esq. (by email)  
Jeannette Vargas, Esq. (by email)